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**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

JEFFERY ALONZO SIMMS,)	
)	
)	
Plaintiff,)	C.A. No. 04-1205-SLR
)	
v.)	
)	
M.D. HARRY M. FREEMAN, ET AL)	JURY OF 12 DEMANDED
)	
Defendants.)	

RE-NOTICE OF DEPOSITION

TO: Jeffrey M. Austin, Esquire
Elzufon Austin Reardon Tarlov & Mondell, P.A.
300 Delaware Avenue, Suite 1700
P.O. Box 1630
Wilmington, DE 19899-1630

Ralph K. Durstein, III, Esquire
Department of Justice
Carvel State Office Building
820 N. French St.
Wilmington, DE 19801

Jeffrey Alonzo Simms
SBI # 198625
Delaware Correctional Center
Unit V-Building A-Tier
1181 Paddock Road
Smyrna, DE 19977

PLEASE TAKE NOTICE that the undersigned attorney will take the oral deposition of plaintiff Jeffrey Alonzo Simms on Wednesday, July 19, 2006, at 11:30 a.m., at the Delaware Correctional Center, 1181 Paddock Rd., Smyrna, DE 19977.

McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo

Dana Spring Monzo

Daniel L. McKenty

1225 N. King Street, Suite 1100

P.O. Box 397

Wilmington, DE 19899-0397

(302) 655-6749

Attorneys for Defendant Roberta F. Burns, M.D.

Dated: July 17, 2006

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DISTRICT OF DELAWARE**

JEFFERY ALONZO SIMMS)	
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Plaintiff)	C.A. No. 04-1205-SLR
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v.)	
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M.D. HARRY M. FREEMAN, ET AL)	JURY OF 12 DEMANDED
)	
Defendants.)	

CERTIFICATE OF SERVICE

I, **DANA SPRING MONZO**, hereby certify that on this date, **Re-Notice of Deposition** was served upon the following:

Jeffrey M. Austin, Esquire
Elzufon Austin Reardon Tarlov & Mondell, P.A.
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McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo

Dana Spring Monzo, Del. Bar #4605

Daniel L. McKenty, Del. Bar #2689

McCullough & McKenty, P.A.

1225 N. King Street, Suite 1100

Wilmington, DE 19899-0397

(302) 655-6749

Attorneys for Defendant Roberta F. Burns, M.D.

Dated: July 17, 2006